

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SETH STERN, et al.

Plaintiffs,

v.

JPMORGAN CHASE & CO., et al.

Defendants.

Case No. 1:25-cv-02097

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS THE CLASS ACTION COMPLAINT

PLEASE TAKE NOTICE that Defendants JPMorgan Chase & Co., JPMorgan Chase Bank N.A., JPMorgan Chase U.S. Benefits Executive, JPMorgan Chase Compensation & Management Development Committee, Bernadette J. Branosky, Stephen B. Burke, Linda B. Bammann, Todd A. Combs, and Virginia M. Rometty (“Defendants”) by their undersigned counsel, will move this Court, on a date and time to be determined by the Court, for an Order dismissing with prejudice the Complaint due to lack of subject-matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1) and for failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6). In support of their Motion, Defendants rely on the Memorandum in Support of Defendants’ Motion to Dismiss the Class Action Complaint, the Declaration of Dave Rosenberg in Support of Defendants’ Motion to Dismiss the Class Action Complaint, and the exhibits attached thereto, filed concurrently herewith.

Dated: June 3, 2025

Respectfully submitted,

/s/ James O. Fleckner

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Dave Rosenberg, *admitted pro hac vice*

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